

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

13

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1 VIOREL PRICOP

D-2 MIHAELA PRICOP

Defendants.

Case:2:17-cr-20188
Judge: Roberts, Victoria A.
MJ: Majzoub, Mona K.
Filed: 03-30-2017 At 04:14 PM
IND USA V PRICOP, ET AL (BG)

VIOLATIONS:

18 U.S.C. § 2314

31 U.S.C. § 5324(a)

18 U.S.C. § 1957

26 U.S.C. § 7206(2)

26 U.S.C. § 7203

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS ONE THROUGH THREE

(18 U.S.C. § 2314 – Interstate Transportation of Stolen Property)

D-1 VIOREL PRICOP

On or about the dates set forth below, in the Eastern District of Michigan, the defendant, VIOREL PRICOP did unlawfully transport, transmit, and transfer in interstate commerce, to the state of Michigan, the stolen goods, wares and merchandise identified below, valued at \$5,000 or more, knowing the same to have been stolen, converted, or taken by fraud, in violation of Title 18, United States Code, Section 2314.

Count	Date	Item	In transit from	Greater than \$5,000
1	August 2013	Samsung televisions, Model LH75MECPLGA/ZA	Texas to Illinois	Yes
2	February 2015	LG 300 W NB3530A Stylish & Slim Sound Bars	California to Ohio	Yes
3	February 2015	Bose stereo equipment	New Mexico	Yes

COUNTS FOUR THROUGH SEVEN

(31 U.S.C. § 5324(a)(1) – Structuring)

D-2 MIHAELA PRICOP

On or about the dates set forth below, in the Eastern District of Michigan, the defendant, MIHAELA PRICOP, as named below in each Count 4 through 7, knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, did conduct the following transactions in a manner to cause or attempt to cause the following domestic financial institutions, J.P. Morgan Chase Bank and Comerica Bank, to fail to file a report required under section 5313(a) of Title 31 of the United States Code, and any regulation prescribed under such section, and did so while violating another law of the United States or as part of a pattern of any illegal activity involving more than \$100,000 in a 12-month period.

Count	Defendants	Date	Description
4	MIHAELA PRICOP	12/27/12	Deposit of \$5,000 in J.P. Morgan Chase Account 2119
		12/27/12	Deposit of \$5,000 in J.P. Morgan Chase Account 2127
		12/27/12	Deposit of \$5,000 in J.P. Morgan Chase Account 2135
5	MIHAELA PRICOP	8/20/13	Deposit of \$9,000 in Comerica Account 5231
		8/20/13	Deposit of \$9,000 in Comerica Account 5822
		8/20/13	Deposit of \$9,000 in Comerica Account 4281
6	MIHAELA PRICOP	8/30/13	Deposit of \$5,000 in Comerica Account 5231
		8/30/13	Deposit of \$9,000 in Comerica Account 5231
		8/30/13	Deposit of \$9,000 in Comerica Account 5822
		8/30/13	Deposit of \$9,000 in Comerica Account 4281
7	MIHAELA PRICOP	9/29/14	Deposit of \$9,900 into Comerica Account 5822
		9/29/14	Deposit of \$9,800 into Comerica Account 5822

All in violation of Title 31, United States Code, Sections 5324(a)(1) and 5324(d) and Title 31, Code of Federal Regulations, Chapter X, Part 1010.

COUNT EIGHT

(31 U.S.C. § 5324(a)(3) – Structuring)

D-2 MIHAELA PRICOP

From on or about April 2012 and continuing to on or about December 2014, in the Eastern District of Michigan and elsewhere, the defendant, MIHAELA PRICOP, knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Sections 5313(a), and the regulations promulgated thereunder, did structure, assist in structuring, or attempt to structure, or assist in structuring, the following transactions with one or more of the following domestic financial institutions, and did so while violating another law of the United States or as part of a pattern of any illegal activity involving more than \$100,000 in a 12-month period:

Bank Name	Account Ending	Deposit Item Date	Amount	Description
Comerica	5822	4/10/12	\$5,000	Deposit
Comerica	4281	4/10/12	\$5,000	Deposit
Comerica	5822	4/15/13	\$8,400	Deposit
Comerica	5822	4/23/13	\$7,800	Deposit
Comerica	5231	4/30/13	\$4,500	Deposit
Comerica	5822	4/30/13	\$1,000	Deposit
Comerica	5822	5/1/13	\$4,000	Deposit
Comerica	4281	5/1/13	\$1,500	Deposit
Comerica	5231	6/10/13	\$4,900	Deposit
Comerica	5231	6/11/13	\$2,500	Deposit
Comerica	5822	6/11/13	\$4,900	Deposit
Comerica	5822	6/13/13	\$4,900	Deposit
Comerica	5822	9/26/13	\$9,000	Deposit
Comerica	4281	9/30/13	\$8,000	Deposit

Bank Name	Account Ending	Deposit Item Date	Amount	Description
Comerica	5822	4/28/14	\$5,000	Deposit
Comerica	5822	4/30/14	\$9,500	Deposit
Comerica	5822	7/7/14	\$7,000	Deposit
Bank of America	4928	7/7/14	\$6,800	Deposit
Bank of America	4928	12/3/14	\$9,500	Deposit
Bank of America	4928	12/5/14	\$9,500	Deposit
Bank of America	4928	12/8/14	\$9,000	Deposit
Bank of America	4928	12/15/14	\$7,500	Deposit

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d), and Title 31, Code of Federal Regulations, Chapter X, Part 1010.

COUNTS NINE THROUGH TWENTY

(18 U.S.C. § 1957 – Monetary Transactions in Property Derived from Specified Unlawful Activity)

D-1 VIOREL PRICOP

D-2 MIHAELA PRICOP

On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, defendants VIOREL PRICOP and MIHAELA PRICOP, as named below in each Count 9 through 20, did knowingly engage and attempt to engage in the following monetary transactions, by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, transfer or exchange of U.S. currency, and monetary instruments, such property having been derived from a

specified unlawful activity, that is, Interstate Transportation of Stolen Property in violation of Title 18, United States Code, Section 2314. Each of the financial transactions listed in the table below constitutes a separate count of this

Indictment:

Count	Defendant	Date	Amount	Monetary Source	Payee/Description
9	MIHAELA PRICOP	4/13/12	\$113,153	U.S. Currency	Cauley Ferrari for the purchase of a Ferrari
10	MIHAELA PRICOP	8/20/12	\$23,000	U.S. Currency	Deposited U.S. Currency into business account at Comerica Bank.
			\$22,687.99	Cashier's Check	Purchased Cashier's Check to Oakland County for purchase of vacant property adjoining the PRICOP residence
11	MIHAELA PRICOP	12/18/12	\$21,027	U.S. Currency	Detroit Country Day School for children's tuition
12	VIOREL PRICOP	5/28/13	\$20,989.21	U.S. Currency	Oklahoma Kenworth for repair services on a tractor trailer
13	MIHAELA PRICOP	6/3/13	\$22,315	U.S. Currency	Williams & Williams Worldwide Realty for purchase of real property.
14	MIHAELA PRICOP	7/25/13	\$15,743	U.S. Currency	MLC Motorcars for the purchase of a Sport Utility Vehicle

Count	Defendant	Date	Amount	Monetary Source	Payee/Description
15	VIOREL PRICOP	8/26/13	\$200,000	U.S. Currency	Deposited into personal bank account at Comerica Bank
	MIHAELA PRICOP		\$197,000	Cashier's Check	Purchased Cashier's Check payable to Oakland County for purchase of 1242 Huntcliff, Milford, MI
16	MIHAELA PRICOP	2/11/14	\$28,986	U.S. Currency	Mercedes Benz of West Bloomfield for the purchase of a vehicle
17	MIHAELA PRICOP	3/18/14	\$15,000	U.S. Currency	Mercedes Benz of West Bloomfield for the purchase of a vehicle
18	MIHAELA PRICOP	3/26/14	\$70,000	U.S. Currency	Mercedes Benz of West Bloomfield for the purchase of a vehicle
19	MIHAELA PRICOP	9/5/14	\$35,941	U.S. Currency	Detroit Country Day School for children's tuition
20	MIHAELA PRICOP	2/6/15	\$14,000	U.S. Currency	Detroit Country Day School for children's tuition

All in violation of Title 18, United States Code, Section 1957.

COUNTS TWENTY-ONE THROUGH TWENTY-FOUR

(26 U.S.C. § 7206(2) – Aiding and Assisting in Preparation of a False Return)

D-1 VIOREL PRICOP

D-2 MIHAELA PRICOP

On or about the dates hereinafter set forth, in the Eastern District of Michigan, the defendants VIOREL PRICOP and MIHAELA PRICOP, residents of Milford, Michigan, did willfully aid and assist in, or caused the preparation or presentation to the Internal Revenue Service, of U.S. Individual Income Tax Returns, Forms 1040, for VIOREL and MIHAELA PRICOP, jointly, in each of the calendar years hereinafter specified. The returns were false and fraudulent as to material matters in that they under-reported the defendants' total income, when, as defendants knew, defendants' total income for the years hereinafter specified was significantly more than reported and the tax due in each year was higher, than the tax paid.

Count	Date of Offense	Taxpayer	Calendar Tax Year	Falsely Claimed Item	Amount Claimed
21	April 2011	VIOREL PRICOP MIHAELA PRICOP	2010	Total income	\$59,289
22	April 2012	VIOREL PRICOP MIHAELA PRICOP	2011	Total income	\$61,649
23	April 2013	VIOREL PRICOP MIHAELA PRICOP	2012	Total income	\$57,308
24	April 2014	VIOREL PRICOP MIHAELA PRICOP	2013	Total income	\$51,187

All in violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-FIVE

(26 U.S.C. § 7203 – Failure to File a Return)

D-1 VIOREL PRICOP

D-2 MIHAELA PRICOP

During the calendar year 2014, defendants VIOREL PRICOP and MIHAELA PRICOP, who were residents of Milford, Michigan, had and received gross income totaling approximately \$693,298. By reason of that gross income, defendants VIOREL PRICOP and MIHAELA PRICOP were required by law, following the close of the calendar year 2014 and on or before April 15, 2015, absent an extension, to make a 2014 income tax return filed with the Internal Revenue Service, stating specifically the items of their gross income and any deductions and credits to which they are entitled. Well knowing and believing all the foregoing, defendants VIOREL PRICOP and MIHAELA PRICOP did willfully fail, on or about April 15, 2015, in the Eastern District of Michigan and elsewhere, to make an income tax return; all in violation of Title 26, United States Code, Section 7203.

FORFEITURE ALLEGATIONS

(18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1),
31 U.S.C. § 5317, 28 U.S.C. § 2461(c) - Criminal Forfeiture)

The allegations contained in Counts One through Twenty of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging

forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 982(a)(1) and Title 31, United States Code, Section 5317.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 2314, the defendant, VIOREL PRICOP, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations.

Pursuant to Title 31, United States Code, Section 5317(c)(1), upon conviction of an offense in violation of Title 31, United States Code, Section 5324, the defendant, MIHAELA PRICOP, shall forfeit to the United States of America any and all property, real or personal, involved in the offenses, and any property traceable to such property.

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1957, the defendants, VIOREL PRICOP and MIHAELA PRICOP, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations and/or any and all property, real or personal, involved in the offenses, and any property traceable to

such property.

Money Judgment. Property to be forfeited includes, but is not limited to, a money judgment, and all traceable interest and proceeds for which the defendants are jointly and severally liable. Such sum in aggregate is property representing the proceeds of violations of Title 18, United States Code, Sections 2314 and/or 1957, or property that is traceable to such property, and/or property involved in violations of Title 18, United States Code, Section 1957 and/or Title 31, United States Code, Sections 5324(a)(1) and/or (a)(3).

Substitute Assets. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), and/or Title 31, United States Code, Section 5317(c), defendants shall forfeit substitute property, up to the value of the property described above, if, as a result of any act or omission of any defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been

substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

THIS IS A TRUE BILL.

S/GRAND JURY FOREPERSON
GRAND JURY FOREPERSON

DANIEL L. LEMISCH
Acting United States Attorney

S/LINDA AOUATE
LINDA AOUATE [P70693]
Assistant United States Attorney
Chief, Forfeiture and Financial Litigation Unit
211 West Fort Street, Ste 2001
Detroit, MI 48226
(313) 226-9587
email: linda.aouate@usdoj.gov

S/ADRIANA N. DYDELL
ADRIANA N. DYDELL [CA 239516]
Assistant United States Attorney
211 West Fort Street, Ste 2001
Detroit, MI 48226
(313) 226-9125
email: adriana.dydell@usdoj.gov

Dated: March 30, 2017

Case:2:17-cr-20188

Judge: Roberts, Victoria A.

MJ: Majzoub, Mona K.

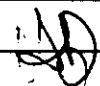
Filed: 03-30-2017 At 04:14 PM

IND USA V PRICOP, ET AL (BG)

United States District Court
Eastern District of Michigan**Criminal Case**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

ORIGINAL

Companion Case Information	Companion Case Number: 15-12620
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned: Marianne O. Battani
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. VIOREL PRICOP, MIHAELA PRICOPCounty where offense occurred : Oakland CountyCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☐ Indictment/ ☐ Information — no prior complaint.☒ Indictment/ ☐ Information — based upon prior complaint [Case number: 15-mj-30088]☐ Indictment/ ☐ Information — based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**


Superseding to Case No: _____ Judge: _____

☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 30, 2017

Date



ADRIANA DYDELL

Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, MI 48226-3277

Phone: (313) 226-9125

Fax: (313) 226-3800

E-Mail address: adriana.dydell@usdoj.gov

Attorney Bar #: CA. Bar No. 239516

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.